

KATHLEEN A. LEAVITT  
CHAPTER 13 BANKRUPTCY TRUSTEE  
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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

IN RE:  
JORGE R ALCAZAR

Debtor(s)

CASE NO: BKS-20-12395-BTB

CHAPTER 13

Hearing Date: August 13, 2020

Hearing Time: 1:30 pm

LAW OFFICE OF MICHAEL J HARKER  
Attorney for the Debtor

**TRUSTEE'S OPPOSITION TO CONFIRMATION OF PLAN  
#1 COMBINED WITH TRUSTEE'S RECOMMENDATION FOR DISMISSAL**

Comes now KATHLEEN A. LEAVITT, Chapter 13 Bankruptcy Trustee, in the above captioned  
bankruptcy case and hereby alleges as follows:

**Statement of Facts**

The Debtor(s) filed for Chapter 13 relief on 05/17/2020. The Section 341(a) Meeting of Creditors held on  
July 21, 2020 at 9:00 am was concluded .

**Argument**

The Trustee objects to confirmation of the Chapter 13 Plan and recommends that this case be dismissed  
pursuant to 11 U.S.C. §1307(c) for one or more of the following reasons:

- Debtor(s) is/are delinquent in plan payments. 11 U.S.C. §1307(c)(1)
- Plan is not feasible as required by 11 U.S.C. §1322 based on: Republic Services

Debtor(s) failed to cooperate with the Trustee as necessary to enable the Trustee to perform her duties pursuant to 11 U.S.C. §521(a)(3), §704 and/or §1302. This failure to cooperate has caused unreasonable delay that is prejudicial to creditors under 11 U.S.C. §1307(c)(1) as the Debtor(s) did not provide the following documents and/or amendments:

- Paystubs for the following period(s): 11/1/19-4/30/20 all sources. 11 U.S.C. §704(a)(4) and/or 11 U.S.C. §521(a)(1)(B)(iv).
- Bank Statement(s) for the following period(s): bank account #4763: 3/17/2020 - 5/7/2020 (bank account listed on tax return).

Finally, Trustee makes the following statements in an effort to maintain a clear record:

- Debtor should ensure that all creditors have been noticed pursuant to LR 1007(b)(5)(B).

**Conclusion**

WHEREFORE, for the foregoing reasons, the Trustee objects to confirmation and recommends that this case be dismissed pursuant to 11 U.S.C. §1307(c).

Dated: 7/23/20

/s/ Kathleen A. Leavitt  
Kathleen A. Leavitt  
Chapter 13 Trustee

KATHLEEN A. LEAVITT  
CHAPTER 13 STANDING TRUSTEE  
711 S 4Th Street  
Suite 101  
Las Vegas, NV 89101

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

**IN RE:**

**CASE NO: BKS-20-12395-BTB  
Chapter 13**

**JORGE R ALCAZAR**

**Debtor (s)**

**CERTIFICATE OF SERVICE**

1. On July 23, 2020, I served the following document(s):

**TRUSTEE'S OPPOSITION TO CONFIRMATION OF PLAN #1 COMBINED WITH  
TRUSTEE'S RECOMMENDATION FOR DISMISSAL**

2. I served the above-named documents(s) by the following means to the persons

as listed below:

**United States mail, postage fully prepaid**

JORGE R ALCAZAR  
7018 SALT MARSH CT  
LAS VEGAS, NV 89148

LAW OFFICE OF MICHAEL J HARKER  
2901 EL CAMINO AVE  
SUITE 200  
LAS VEGAS, NV 89102

**I declare under penalty of perjury that the foregoing is true and correct.**

Signed on: 7/23/20

/s/ Esther Carr  
Employee of  
Kathleen A. Leavitt  
Chapter 13 Standing Trustee